1   determined with respect to Ameritech Illinois for each to allow an appropriate

2   assessment of the proposed comparative measure.

3

4 Q. **CAN YOU PROVIDE ILLUSTRATIONS OF WHAT MODIFICATIONS OR**

5   **CLARIFICATIONS APPEAR NECESSARY WITH RESPECT TO THE**

6   **ACCURACY AND TIMELINESS MEASURES?**

7 A. Again, Ameritech has provided only very limited descriptive material, but

8   based upon what is available, the measures are far too aggregated. Mr.

9   Mickens notes [Ex. 8.0, p. 23], "Ameritech Illinois is committed to assuring

10   that the availability, transaction accuracy and timeliness of these interfaces

11   are at parity with the internal use of these same functions." By explicitly

12   using the word "transaction" in the statement of Ameritech Illinois'

13   commitment, I understand Ameritech Illinois to mean that both accuracy and

14   timeliness will be measured for key transactions as opposed to only providing

15   a meaningless measure of a mixture of transactions. If that is not Ameritech

16   Illinois' intent, then serious questions regarding inadequacies of the measures

17   would exist as I just discussed for platform availability.

18

19   Furthermore, each transactional measure should be specific to a single

20   interface. The accuracy and timeliness of transactions is crucial to quality

21   execution of the process supported by the interface. It is the successful

22   execution -- in terms of both timeliness and accuracy -- of these transaction

23   that will permit CLECs to provide customer servicing that is competitive with

24   that of Ameritech Illinois. Because of the varying types of transactions, the

25   differing intensity of use and differing times involved for processing,

1   monitoring measures that aggregate all transactions would be virtually

2   useless.

3

4   Assuming the CLECs can monitor appropriate transactional measures for the

5   performance they experience, they will still lack the comparable Ameritech

6   Illinois measures necessary to determine whether or not the OSS access is

7   nondiscriminatory. Therefore, Ameritech Illinois must be required to provide

8   appropriate transaction level measures of both quality and timeliness.

9

10   Q.   **WHAT DO YOU MEAN BY TRANSACTION LEVEL MEASURES OF QUALITY?**

11   A.   The transactional measures are specific to each interface and can become

12   quite extensive. Nevertheless, certain key measures, undoubtedly, can be

13   identified that balance the need to monitor the delivery of nondiscriminatory

14   access to OSS functionality without becoming overly burdensome.

15   Moreover, many of these or similar measures are used by customer focused

16   businesses to assess performance of their business processes.

17

18   The basic measure that AT&T believes will initially serve the purpose of

19   monitoring transaction accuracy and timeliness, for each interface, are listed

20   in Attachment III of my testimony.

21

22   Q.   **COULD THE ACTUAL VALUES FOR THE TRANSACTIONAL MEASURES BE**

23   **CONSIDERED PROPRIETARY?**

24   A.   Some may be. If the CLECs or Ameritech Illinois perceive that such

25   information is proprietary, then an alternative means for reporting actual

26   measures must be established. For example, the individual companies could

1   submit their individual performance to an unaffiliated entity that is bound by

2   appropriate non-disclosure agreements. That entity could review and analyze

3   the data and provide report cards to the Commission and appropriate

4   individual CLEC report cards. The report card could show, for each

5   transactional measure, a simple indication whether, at a 95% level of

6   confidence, that the performance experienced by the CLEC is no less than

7   that experienced by Ameritech Illinois.

8

9   Assuming cooperation by industry participants, the analysis process does not

10   seem overly complex. Because the information is critical to all parties, if cost

11   recovery is an issue, then the costs of the "report card" should be recovered

12   in a competitively neutral manner.

13

14   Naturally, the implementation details would need to be worked out. It seems

15   reasonable to expect that a team of industry representatives could devise a

16   mechanism for reporting performance, funding the work and submit a plan

17   for Commission approval in a relatively short time frame. Naturally clarity

18   and consensus regarding what is actually to be measured and reported would

19   be required as an input.

20

21   Q.   MR. PFAU, YOUR DISCUSSION HAS FOCUSED ONLY UPON THE

22   PROPOSED OSS AND SERVICE LEVEL MEASURES. ARE THERE OTHER

23   MEASURES THAT MUST BE ADDRESSED RELATING TO UNBUNDLED

24   NETWORK ELEMENTS?

25   A.   Yes. Ameritech Illinois is obligated to provide nondiscriminatory access to all

26   unbundled network elements and to combinations of UNEs that CLECs

1 request and that are technically feasible to provide. There is no limitation,

2 when the FCC looked to the state commission for input regarding

3 measurements, that any form of access to unbundled network elements was

4 excluded from monitoring. Accordingly, Ameritech Illinois must provide

5 meaningful tracking that demonstrates nondiscriminatory access is indeed

6 being delivered where UNEs are employed by a CLEC, whether used

7 individually or in combination.

8

9 The testimony of Mr. Mickens shows a prototype for a measurement plan

10 addressing unbundled loops, SS7 links, operator services and directory

11 assistance [Ex. 8.0, Schedules 6, 8, 9 and 12]. With the exception of the

12 unbundled loops, the proposed measurements do not even begin to address

13 more than a single dimension of the three-part test for nondiscriminatory

14 access (i.e., availability, timeliness, accuracy). This lack of comprehensive

15 measures is the first deficiency that must be corrected.

16

17 In addition to the paucity of measures, no enlightenment is provided

18 regarding measurements applicable to other unbundled network elements or

19 unbundled element combinations. For example, this Commission has ordered

20 that Ameritech Illinois make a UNE combination of the loop, local switching

21 and transport, referred to as the platform, available to the CLECs (Order 95-

22 0458/95-0531 Consolidated, p.63). Ameritech, however, is silent regarding

23 how nondiscriminatory access will be demonstrated and monitored for this

24 crucial UNE combination.

25

1 Q.   **WOULD YOU PLEASE SUMMARIZE YOUR TESTIMONY REGARDING THE**

2   **MEASUREMENT PLAN SUBMITTED BY AMERITECH ILLINOIS WITHIN**

3   **THESE PROCEEDINGS?**

4 A.   Ameritech Illinois' proposed measurements are, at this point, inadequate to

5   demonstrate the existence of nondiscriminatory access either to unbundled

6   network elements in general and to operations support systems in specific.

7   As a minimum, Ameritech Illinois needs to make numerous clarifications,

8   expand the measures to address all the UNEs and UNE combinations

9   requested to date, assure that the measurements will address each of the

10   nine OSS interfaces that Ameritech Illinois claims to offer, commit to

11   meaningful service and transactional level measures, show that useful

12   statistical tests can and will be applied to demonstrate the absence of

13   discrimination, and provide actual results that prove nondiscriminatory access

14   is, in fact, being delivered. More importantly, the Illinois Commission must

15   feel confident that the measurement plan ultimately produced adequately

16   reflects the structure and detail necessary to protect developing competition

17   in local services market.

18

19 Q.   **DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

20 A.   Yes.

1   ATTACHMENT I
2
3   Activity Metric Disaggregation By Supported Functionality[1]
4
5   The following material list, by supported process, the minimally acceptable
6   detail for activity related performance measure important to the monitoring
7   of nondiscriminatory support of local services.
8
9
10   ORDERING AND PROVISIONING
11
12   Key Measures should be available by product levels shown in the bold
13   typeface in Attachment I. In addition, data collection and storage of these
14   measures should accommodate display of performance, at the most discrete
15   level specified in Attachment I, should investigation of potential
16   discriminatory behavior become necessary.
17
18   Key Measures for Ordering and Provisioning Support
19
20   †   **Provisioning Intervals**
21   †   **Initial Failure Rates**
22   **Held Order Intervals**
23   †   **Speed of Answer by Support Center**
24   **Speed of Inquiry Resolution**
25   †   **Due Dates Not Met**
26
27   Each of the preceding measures should be capable of being displayed by the
28   **Type of Activity, Activity Driver,** or any combination of the two attributes.
29
30   Type of Activity
31   Establish New Service (Account)
32   Disconnect All Services (Account)
33   Modify Existing Service-Add features/functions
34   Modify Existing Service-Delete features/functions
35   Modify Existing Service-Add & delete features/functions
36   Records Only
37
38   Activity Driver
39   Dispatch Required
40   No Dispatch Required
41
42   † Ameritech Illinois (Schedules Attached to Exhibit 8.0) indicates a willingness
43   to supply this measure.

1 ATTACHMENT II
2
3 Activity Metric Disaggregation By Supported Functionality[1]
4
5 MAINTENANCE AND REPAIR
6
7 Key Measures should be available by product levels shown in the bold
8 typeface in Attachment I. In addition, data collection and storage of these
9 measures should accommodate display of performance, at the most discrete
10 level specified in Attachment I, should investigation of potential
11 discriminatory behavior become necessary.
12
13   Key Measures for Maintenance & Repair Support
14
15 †   **Time to "Resolve" Trouble**
16 †   **Repeat Troubles**
17   **Appointments Met**
18 †   **Trouble Rate**
19 †   **Speed of Answer by Support Center**
20   **Speed of Inquiry Resolution**
21
22 Each of the preceding measures should be capable of being displayed by the
23 **Severity of Trouble, Necessity to Dispatch, Type of Trouble,** or any
24 combination of the three attributes.
25
26
27   Severity of Trouble
28   Customer Out of Service
29   Other Troubles
30
31   Necessity to Dispatch
32   Premises Visit Required
33   No Premises Visit Required
34
35   Type of Trouble
36   Network Failure
37   Access Line Failure
38   Customer Requested Monitoring
39   No Trouble Found
40   Other
41
42
43 † Ameritech Illinois (Schedules Attached to Exhibit 8.0) indicates a willingness
44 to supply this measure.

1　ATTACHMENT II

2

3　Activity Metric Disaggregation By Supported Functionality[1]

4

5

6　BILLING

7

8　Key Measures for the support of billing need not be subject to disaggregation
9　by the product.

10

11　　　Key Measures for Billing Support
12　　　**Error Correction Interval - Severity 1**
13　　　**Error Correction Interval - Severity ≥ 2**
14　　　**Data Pack Rejects**
15　　　**Speed of Answer by Support Center**
16　　　**Speed of Inquiry Resolution**

17

18

19　NETWORK PERFORMANCE

20

21　Key Measures ideally should be available by product levels shown in the bold
22　typeface in Attachment I. In addition, data collection and storage of these
23　measures should accommodate display of performance, at the most discrete
24　level specified in Attachment I, should investigation of potential
25　discriminatory behavior become necessary. However, if such a level of detail
26　proves infeasible, at least composite network results should be gathered and
27　retained and, where appropriate, distinction made between voice (analog)
28　services and higher speed data (digital) services

29

30

31　　　Key Measures for Network Quality Support[2]
32　　　**Network Availability**
33　　　**Network Events**
34　　　**Dial Tone Delay[3]**
35　　　**Call Completion Rate[3]**
36　　　**Blockage Rate[3]**
37　　　**Post Dial Delay[3]**
38　　　**Errored Seconds[4]**
39　　　**Severely Errored Seconds[4]**

40

41

42　† Ameritech Illinois (Schedules Attached to Exhibit 8.0) indicates a willingness
43　to supply this measure.

1 ATTACHMENT II
2
3 Activity Metric Disaggregation By Supported Functionality[1]
4
5 UNBUNDLED NETWORK ELEMENTS[5]
6
7 Product disaggregation is not relevant to Key Measures for the support of
8 Unbundled Network Elements. Measures related to access to OSS
9 functionality are outlined within Attachment III.
10
11
12   Key Measures for Unbundled Network Element Support
13   **Accuracy of Routing** (e.g., to CLEC Operator Services, CLEC
14   Directory Service or VoiceMail Platforms)
15 †   **Availability** (e.g., collocation denied, loop element unavailable,
16   Signaling A or D link down)
17   **Query Cycle Time** (e.g., to SCPs, LIDB)
18   **Update Cycle Time** (e.g., time to establish CLEC record in
19   Ameritech databases)
20   **Speed of Answer by Support Center**
21   **Speed of Response to Inquiries**
22 †   **Speed of Operator Answer**[6]
23 †   **Speed of Directory Assistance Answer**[6]
24
25 Notes:
26
27   1. Measurement of metrics must support statistically valid comparisons to
28   demonstrate that the CLEC performance is not worse than that
29   experienced by Ameritech Illinois. Items in bold should be reported on a
30   regular basis.
31   2. Additional transmission quality measures relating to voice services such a
32   noise, attenuation distortion, loss, balance, signal-to-noise, cross talk,
33   circuit notch noise would also be desirable.
34   3. Voice/analog service measures
35   4. Digital service measures
36   5. Due to a lack of experience with the processes to obtain and support UN
37   the following measures must be consider "preliminary" and likely to
38   require on-going review and adjustment.
39   6. These metrics should be specific to the instances where Ameritech Illino
40   is provides the OS/DA where the CLEC is not reselling retail services of
41   Ameritech Illinois.
42
43 † Ameritech Illinois (Schedules Attached to Exhibit 8.0) indicates a willingness
44 to supply this measure.

1   Attachment III

2

3   OUTLINE OF OSS INTERFACES MEASUREMENTS[1]

4

5   The following material identifies measures relevant to the

6   measurements at the operational support systems interfaces provided

7   by Ameritech Illinois. Because AT&T has yet to complete end-to-end

8   testing, AT&T is not in a position to fully assess the technical feasibility

9   of capturing each of these measures. Nevertheless, the measures

10   represent a reasonable starting point for determining

11   nondiscriminatory access as they address timeliness, availability and

12   accuracy. Each of these measures must attain performance levels not

13   less than that experienced by Ameritech Illinois for access to the same

14   OSS functionality.

15

16   **PREORDERING TRANSACTION-BASED INTERFACE MEASURES**

17   Interface Availability during business hours

18   Interface Availability outside business hours

19   Successful Query - Response Interval[3]

20   Query Failure Rates[3]

21   Speed of Answer by Support Center

22   Speed of Inquiry Closure

1   Attachment III

2   OUTLINE OF OSS INTERFACES MEASUREMENTS[1]

3

4   **ORDERING AND PROVISIONING TRANSACTION-BASED INTERFACE MEASURES**

5   Interface Availability during business hours

6   Interface Availability outside business hours

7   Firm Order Confirmation Interval

8   Order Reject Rate

9   Supplement Reject Rate

10   Speed of Answer by Support Center

11   Speed of Inquiry Closure

12

13   **BATCH INTERFACES (PREORDERING, ORDERING, RECORDED USAGE,**

14   **SERVICES RESALE INVOICING, UNE INVOICING)**

15   Interval Between File Transfer Failures

16   Record Error Rate (% records failing to meet format standards)

17   Record Delivery Failure Rate (% records delivered after agreed interval)

18   Speed of Answer by Support Center

19   Speed of Inquiry Closure

20

21   Notes:
22   1. Measurement of metrics must support statistically valid comparisons
23   to demonstrate that the CLEC performance is not worse than that
24   experienced by Ameritech Illinois.
25   2. These measurements must be capable of being disaggregated by the
26   primary preordering requests: Appointment Scheduling, Service
27   Availability, Availability of $\leq$ 5 Telephone Numbers, Availability of >
28   5 Telephone Numbers, Availability of a Vanity Number(s), Supply of
29   Customer Service Record(s).

30

Attachment to
Sprint Legal
Memorandum
re: 5271 issued
filed 1/8/97

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion, to)
consider Ameritech Michigan's compliance with the)   Case No. U-11104
competitive checklist in Section 271 of the)
Telecommunications Act of 1996.   -   )

AFFIDAVIT OF BETTY L. REEVES
ON BEHALF OF SPRINT COMMUNICATIONS COMPANY L.P.

STATE OF MISSOURI   )
) SS.
COUNTY OF JACKSON   )

I, Betty L. Reeves, being first duly sworn upon oath, do hereby depose and state as follows:

1.   My name is Betty L. Reeves. I am employed by Sprint Communications Company

L.P. ("Sprint") as Director - Local Market Development. In this capacity, I have led Sprint's effort to

negotiate an interconnection agreement with Ameritech.

Education and Professional Experience

2.   I have an Associates in Business degree from Tyler Junior College and majored in

Accounting at the University of Texas. I began my telecommunications career in 1973 with United

Telephone Company of Texas, a local division subsidiary of Sprint Corporation. After holding a

variety of financial management positions, I assumed responsibility for managing United of Texas'

revenue accounting functions in June of 1979 and remained in that position until the company's

merger with United Midwest Group in 1988. As Revenue Accounting Manager, I had responsibility

for toll processing, end user and carrier access billing functions, as well as Interexchange Carrier

and intraLATA toll settlements. With the merger, I transitioned into a regulatory/account

management position with Midwest Group with primary responsibility for all companies/carriers

operating within the Southwestern Bell region. In October of 1988, I joined Sprint Local Division's corporate staff as a Billing Services Manager, with responsibility for software development, billing contract negotiations, and development of standardized billing process and control functions across all local operating divisions. In May, 1992, I transferred to the Corporate Revenues department and assumed responsibility for managing the Local Division's billing and collections relationship with AT&T, including the establishment of a new work group dedicated to the project management of all electronic systems and operational processes impacting AT&T's incumbent local exchange carrier (ILEC) end user billing and collections requirements. With the passage of the 1996 Telecommunications Act, I was charged with managing AT&T's request for local market entry in Sprint Corporation's Local Division's operating territory. In May, 1996, I accepted responsibility for supporting the development and execution of Sprint's corporate strategy for local market entry in all states currently served by Ameritech.

Operational Support Systems Issues

3.   In meetings with Ameritech representatives, Paul Monti and Darlene Siejkowski, in Milwaukee, Wisconsin, on Tuesday, January 7, 1997, I was able to determine that while Ameritech has provided specifications for electronic interfaces to their ordering, provisioning, and maintenance systems, they are only testing their Pre-order interface with one small carrier and no carrier is interfacing with them using their proposed interface for Trouble Reporting. While Ameritech has been pro-active in attempting to identify automated solutions for interfacing with their new local competitors, their proposals have not yet been adopted by any of the large carriers for testing and deployment. While several carriers may be actively working with Ameritech to understand their specifications and either influence the industries adoption of these as acceptable standards or design software solutions to meet these interfaces as "customized" solutions, they can not be tested for parity in performance and assumed to meet the FCC checklist requirements until they have been adequately tested and deployed.

2

4.   Sprint took a total of seven (7) people to Milwaukee on January 7, 1997 in an effort to view Ameritech's electronic interfaces in an operational environment. This meeting was to specifically focus on Ameritech's proposed Pre-order interface, part of their "Electronic Service Ordering" specifications (which is a customized Ameritech solution not currently being supported by any other RBOC). Upon arrival in Milwaukee, we were told that we would not be able to view the Pre-order process in operation because it was still in the "beta" test phase and not currently being used or supported by the operations team. Ameritech's Pre-order process is not in fact operational at this time.

5.   When Sprint met with the operations team assigned to the trouble reporting process, I was also told that they currently had no carrier transmitting data to them over their electronic trouble reporting system ("Electronic Bonding"). Once again, Ameritech has pro-actively initiated an effort to take an industry standard process (access trouble reporting) and define it for local use. The industry is evaluating this system for local service use but none of the records have been defined for local use by the industry. Ameritech's proposed record definitions may ultimately affect the industry's decisions but any system development that matches Ameritech's interface today may subsequently require significant modification to meet industry standards for interface with other carriers.

6.   The only "resale" electronic interface that Ameritech has in operations today with any carrier is their Electronic Service Ordering process which is based on an EDI format and closely matches the format currently being reviewed by industry forums and many of the RBOCs for local use. It is my understanding from our meeting and review with the Wisconsin Service Center personnel that there are a few small carriers interfacing with Ameritech today using this electronic application; however they "cautioned" us that we should require and support weekly conference calls when we initiate the use of this application with their company. Ameritech's operations staff believe

3

that working through the difficulties of implementing this process will require resource commitments by both companies prior to its use in any local service environment.

7.   It is also worthy of note that Sprint went into arbitration with Ameritech regarding our request for support of a interim manual interface until such time as "industry standard" electronic interfaces could be designed and deployed. While this had been acceptable to the operations implementation team in previous discussions, when we requested that this process be supported by the proposed interconnection contract, Ameritech refused. Ameritech's legal and regulatory response was that since they were required by the FCC to provide electronic interfaces by January 1, 1997, they should not be required to support manual interfaces, especially with a company the size of Sprint. Ameritech subsequently, at the request of the Illinois Commission, submitted a cost study which indicated it took them an average of 12 additional minutes to process a manual service order and Sprint should be required to remit approximately $300,000 to Ameritech for a proposed six month interim period processing based on an estimated 300 orders per day. Sprint went into hearing before the Illinois Arbitration Panel in December and disputed both the basis of the cost, the volumes used by Ameritech for daily averages and duration, as well as the time estimate used for order processing. In our meeting on January 7, 1997 with Ameritech's Customer Service - Resale Manager, Darlene Siejkowski, we were able to confirm that the average processing time for an "as is" service order is approximately 3 minutes with an additional two minutes required if the order is for a new end user (i.e., new service order requiring provisioning etc.). The service center also believes that the appropriate non-recurring service order charge for "as is" requests should be limited to a change in responsibility since the only action they must take is to pull up the "existing customer account and change the billing name and address and identify the customer with the appropriate CLEC account indicator(s)."
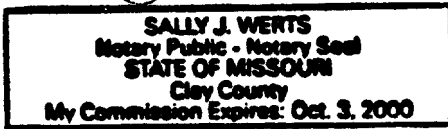
Conclusion

8. Until Ameritech's proposed operational interfaces have been implemented and are actually working in practice, it is impossible to determine whether the requirements of the Telecommunications Act of 1996 are being met.

_____
Betty L. Reeves

Subscribed and sworn to before me
this 8th day of January, 1997.

_____
Notary Public

SALLY J. WERTS
Notary Public - Notary Seal
STATE OF MISSOURI
Clay County
My Commission Expires: Oct. 3. 2000

BEFORE THE ILLINOIS COMMERCE COMMISSION

Matters Relating to Satisfaction of	)	
Conditions for Offering InterLATA Service	)	ICC Docket 96-0404
(Illinois Bell, Inc. d/b/a Ameritech Illinois)	)	

SUPPLEMENTAL DIRECT TESTIMONY
OF BETTY L. REEVES
ON BEHALF OF
SPRINT COMMUNICATIONS COMPANY L.P.

1 Q. **Please state your full name and business address.**

2 A. My name is Betty L. Reeves. My business address is 7301 College Blvd., Overland

3 Park, KS, 66210.

4

5 Q. **What is your position?**

6 A. I am employed by Sprint as Director - Local Market Development.

7

8 Q. **Please describe your educational background, work experience and present**

9 **responsibilities.**

10 A. I have an Associates in Business degree from Tyler Junior College and majored in

11 Accounting at the University of Texas. I began my telecommunications career in 1973

12 with United Telephone Company of Texas, a local division subsidiary of Sprint

13 Corporation. After holding a variety of financial management positions, I assumed

14 responsibility for managing United of Texas' revenue accounting functions in June of

15 1979 and remained in that position until the company's merger with United Midwest

16 Group in 1988. As Revenue Accounting Manager, I had responsibility for toll processing,

17 end user and carrier access billing functions, as well as Interexchange Carrier and

18 intraLATA toll settlements. With the merger, I transitioned into a regulatory/account

19 management position with Midwest Group with primary responsibility for all

20 companies/carriers operating within the Southwestern Bell region. In October of 1988,

21 I joined Sprint Local Division's corporate staff as a Billing Services Manager, with

1 responsibility for software development, billing contract negotiations, and development

2 of standardized billing process and control functions across all local operating divisions.

3 In May, 1992, I transferred to the Corporate Revenues department and assumed

4 responsibility for managing the Local Division's billing and collections relationship with

5 AT&T, including the establishment of a new work group dedicated to the project

6 management of all electronic systems and operational processes impacting AT&T's

7 incumbent local exchange carrier (ILEC) end user billing and collections requirements.

8 With the passage of the 1996 Telecommunications Act, I was charged with managing

9 AT&T's request for local market entry in Sprint Corporation's Local Division's operating

10 territory. In May, 1996, I accepted responsibility for supporting the development and

11 execution of Sprint's corporate strategy for local market entry in all states currently

12 served by Ameritech.

13

14 Q. What is the purpose and scope of your testimony?

15 I am presenting testimony on behalf of Sprint Communications Company L.P. (Sprint)

16 pursuant to the schedule for supplemental testimony set by the Hearing Examiner and

17 later extended by agreement of the parties. The purpose of my testimony is to provide

18 a view of local competition in Ameritech territory from the perspective of a competitive

19 local exchange carrier (CLEC) that is working to achieve operational readiness for local

20 market entry in Illinois and respond to claims by Ameritech that its OSS systems and

21 interfaces are fully ready and complete to satisfy its obligations under Section 271 of the

1 Telecommunications Act. My testimony demonstrates that Ameritech is not operationally

2 ready from an OSS perspective to provide interconnection, unbundled elements, or resale

3 in a timely, reliable, and nondiscriminatory manner, and in quantities that may be

4 reasonably requested by CLECs.

5

6 Q. **What is the current status of Sprint's negotiations with Ameritech for market**

7 **entry within Illinois?**

8 Sprint is currently engaged in negotiations with Ameritech for operational implementation

9 of our interconnection agreement in Illinois. Sprint and Ameritech have entered into a

10 non-disclosure agreement which was designed to protect any information shared or

11 discussed through our Joint Implementation Team. Sprint is, however, free to address

12 issues of policy, contractual commitments, information shared openly with any and all

13 CLECs, or the results of actual testing or operational implementation results.

14

15 Q. **Are Ameritech's interfaces, in fact, operationally ready at the present time?**

16 A. No. Operational Readiness is the final phase of a systems development effort. An

17 interface between two systems and two or more players is deemed to be operationally

18 ready only when the two systems work together satisfactorily with the underlying systems

19 on both sides of the interface delivering the services for which the interface was

20 designed. Ameritech can not unilaterally declare that its interfaces are operationally

21 ready because Ameritech is only one of the interface users and can not complete an

1 adequate operational readiness test without the support and involvement of the other

2 interface user or partner.   In a competitive environment, this testing can not be

3 satisfactorily completed and certified to meet the parity test with a "hand-picked" partner.

4 System testing should demonstrate that the system not only performs according to its

5 design requirements but that the defined business rules support an accurate exchange of

6 data and the ability to process the transactional load at volumes which should be

7 reasonably expected to occur as the competitive marketplace develops. This load can not

8 be adequately tested by merely increasing the volumes of data loaded from a single point.

9 Rather, a meaningful test of the system must combine the volume requirements with the

10 complexity of multiple users launching transactions from various entry points and

11 sequences. These conditions are difficult to address in a "test" environment but it is

12 essential for Ameritech to demonstrate that its interfaces will function correctly under the

13 conditions presented by a competitive environment in order to support a claim of parity

14 and operational readiness. Ameritech has not shown that its interfaces will be able to

15 function under these conditions.

16

17 Sprint's evaluation is consistent with the Wisconsin Public Service Commission's recent

18 decision in Docket No. 6720-T1-120 that these very same Ameritech operational support

19 systems are not operationally ready and have not been proven to provide parity with

20 Ameritech's own retail division.

21

1 Q. Has Ameritech demonstrated that its pre-order interface is operationally ready for

2 use by multiple CLECs in a competitive environment?

3 A. No. An effective electronic interface which provides timely access to Customer Service

4 information is crucial to any CLEC attempting to enter the local market via the resale of

5 the ILEC's services. The interface currently being offered by Ameritech has not been

6 deployed for use by any major CLEC, and in fact is only in limited use by one of

7 Ameritech's local market competitors today. Per Schedule 2 attached to Mr. Joseph

8 Rogers' Supplemental Direct Testimony, USN is using Ameritech's pre-order interfaces

9 for gaining access to Ameritech customer service records (CSRs). However, per the

10 testimony of USN's witness, Mr. Steven Parrish, Executive Vice President of Operations,

11 in the Wisconsin 271 OSS hearings held earlier this month, USN's business operation

12 does not require that it have access to this information on a real-time basis. By contrast,

13 competitors such as AT&T, Sprint, or MCI would require immediate access to this

14 information as they interact on-line with end users requesting local service. This type of

15 interaction requires an average response time of six (6) seconds or less. While Ameritech

16 has accepted this response time as a requirement, it has been unable to demonstrate its

17 proposed system's responsiveness in an actual operating environment, or that it can

18 support a 6 second response time to multiple large CLECs who will simultaneously be

19 accessing the Ameritech databases.

20 USN is not even using Ameritech's pre-order interface for any of the other business

21 functions, such as telephone number selection and due date selection, that Ameritech

1 claims can be supported in a real-time, high volume operational environment. Per

2 Mr. Robert Meixner's Supplemental Direct Testimony at page 13, both of these functions

3 should be supported while the end user customer is on the phone. If these functions

4 actually work as Ameritech's testimony indicates, I must question why USN is still

5 performing these functions manually, i.e. by telephone contact to an Ameritech CLEC

6 service representative.

7 An automated method for accessing this information in a real-time mode is crucial to

8 Sprint's market entry; however, there are no currently approved industry standards for

9 a pre-order interface. Many of the RBOCs are providing various interim solutions for

10 accessing this information including Graphical User Interfaces ("GUI").

11

12 Q. **What is the current status of Sprint's negotiations regarding the use of Ameritech's**

13 **pre-order interface?**

14 A. The only alternative, other than telephone contact, that Ameritech has offered to Sprint

15 is the highly customized GUI interface which requires a significant CLEC resource

16 commitment to implement an unproved interface. Sprint is currently not aware of any

17 GUI being offered by Ameritech for Pre-Order, despite Mr. Rogers' Supplemental Direct

18 Testimony at page 8 referencing CCT's plans to implement "the GUI interface". If such

19 a GUI exists then its processing capabilities and specifications should be made available

20 to all CLECs equally. While Sprint is currently evaluating Ameritech's proposed

21 electronic interface as a potential "interim" solution to meet this critical market entry